

## EIS Scoping Comment on Impacts of Fire from the Proposed GPT's Uncovered Coal Stockpiles on BP Cherry Point Refinery's Nearby Petroleum Storage Tanks

My name is Michael Crum. I am deeply concerned with the potentially significant adverse impacts of inadequately controlled fire in the proposed GPT's coal stockpiles. The five (5) half-mile long and as much as 62 feet high coal stockpiles are expected to store 2.75 million metric tons of uncovered coal. Spontaneous combustion within those massive coal stockpiles poses such a high risk that GPT proposes using 1.9 billion gallons of water annually to reduce the risk of spontaneous combustion. But determining the precise risk of fire at the proposed GPT is difficult, if not impossible, since stockpiling 2.75 million metric tons of uncovered coal is unprecedented at coal shipping terminals in the US.

The GPT Project Information Document, Proposed Project Layout, Figure 1-2 (p.65), offers a rendering of the proposed location of the 80-acre, uncovered coal stockpiles identified as the "East Loop," shown below.

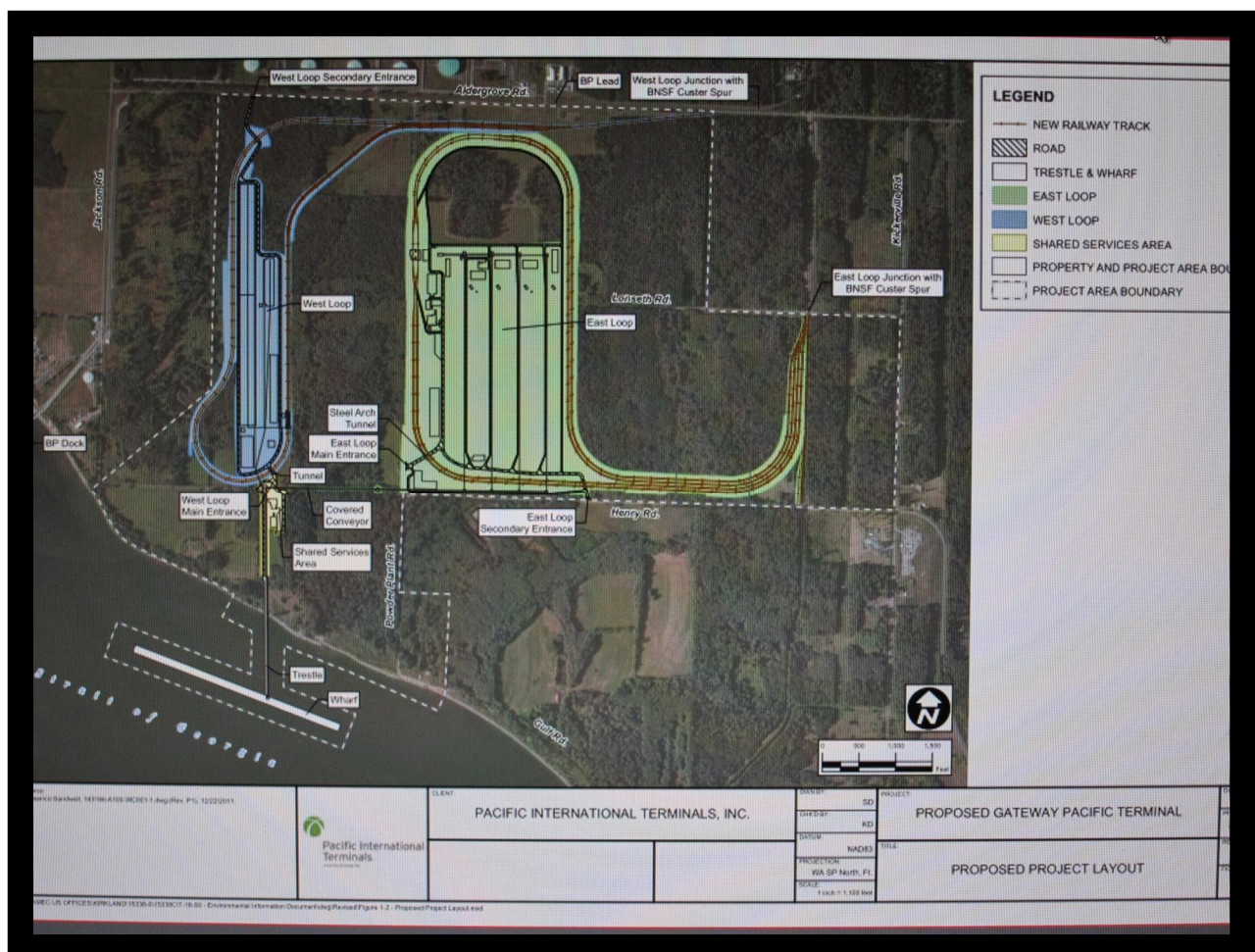


Figure 1-2 shows the proposed location of the coal stockpiles within the GPT site. However, significant structures located just beyond the northern site boundary are obscured by the caption, “West Loop Secondary Entrance” (at top, left).

A *Bing* map, aerial view, (shown below) reveals the aforementioned obscured structures to be five of BP Cherry Point Refinery’s forty seven (47) large petroleum storage tanks, located within 1000 yards of the proposed GPT’s 2.75 million metric tons of uncovered coal stockpiles!



The proposed GPT “East Loop” would be bordered by Aldergrove Rd. (on the north), by what is now Gulf Rd. (on the west), and by what is now Henry Rd (on the south). Even light winds, S-SSE, potentially would blow any emissions from the uncovered coal stockpiles directly over the large petroleum storage tank facility at BP Cherry Point Refinery, since the two facilities would be separated only by Aldergrove Rd.



The location and configuration of the proposed GPT “East Loop,” (uncovered coal stockpiles and materials handling equipment) exceed Whatcom County Code 20.80.210 (Minimum setbacks). Pacific International Terminals’, May 2011 Variance Application PL4-83-010A, page 9 of 10, alleges that reduced setbacks (from Aldergrove Road) would not be detrimental to the public welfare or to the property improvements in the vicinity ... *“since there will be no adjacent property owners in close proximity to the structures, no direct effect to others would occur.”* In fact, Aldergrove Road is the only separation between the proposed GPT “East Loop” and BP Cherry Point Refinery’s forty seven petroleum storage tanks.

Given that the GPT Project Information Document, Chapter 5.8.1.2 proposes that the first two emergency responders for **fire** be provided by unmanned, voluntary response units from Fire District No. 7, and that the proposed GPT uncovered coal stockpiles and materials handling equipment would be in such close proximity to BP Cherry Point Refinery’s array of petroleum storage tanks, I ask that the following be included and be systematically analyzed within the scope of the EIS:

- Impacts to the health and safety of employees at the proposed GPT site from uncontrolled coal stockpile fires resulting from inadequate fire and emergency medical services.
- Impacts to the safety of operations at BP Cherry Point Refinery’s forty seven large volume petroleum storage tanks from inadequately contained or uncontrolled, wind-blown fire from the proposed GPT “East Loop,” (2.75 million metric tons, five half-mile long and 62 feet high, uncovered coal stockpiles).
- Impacts of permitting an Application for Variance to the Whatcom County Code 20.80.210 (Minimum setbacks) for an applicant who fails to identify not only an adjacent property owner (BP Cherry Point Refinery) but fails to identify an adjacent property owner with an array of forty seven, large capacity petroleum storage tanks in close proximity to the property boundary at Aldergrove Road.

- The Whatcom County Code 20.80.210 (Minimum setbacks) questions of whether granting of the requested variance (setback from Aldergrove Road) would be materially detrimental to the public welfare or injurious to the property improvements in the vicinity are critical questions pertaining to this proposed project and are best answered within the scope of the EIS.